

P R O C E E D I N G S

[Whereupon, the witness was duly sworn by the Notary Public.]

WHEREUPON

SAID M. HAMAD

a witness of lawful age, was called for examination by counsel for the Plaintiff and, having been first duly sworn, was examined and testified as follows:

EXAMINATION BY COUNSEL FOR THE PLAINTIFF

BY MR. STRACHMAN:

Q Do you pronounce your name Hamad, Mr. Hamad?

A H-A-M-A-D.

Q Mr. Hamad, where do you reside?

A In Washington, D.C.

Q And your first name is Said?

A Right.

Q What is your address in Washington?

A 1320 18th Street, N.W.

Q That's your residence?

A No, that's the office.

Q Where do you reside, sir?

A In Washington, 2310 44th Street N.W., Washington, D.C.

Q Your office that you work out of, is that at 1320?

A Right.

Q Is that the PLO-PA office?

A PLO Mission.

Q And you know, sir, that you're under oath, is that right?

A Right.

Q And that you are here to answer questions pursuant to a notice of deposition, is that right?

A Yes.

MR. STRACHMAN: I'd like to mark the deposition notice.

THE REPORTER: Do you want it marked as Exhibit 1?

MR. STRACHMAN: Please.

[Whereupon, Hamad Deposition Exhibit No. 1 was marked for identification.]

BY MR. STRACHMAN:

Q And you understand that you must answer truthfully questions that are put to you, is that right?

A Yes.

Q Have you ever been deposed before?

A No.

Q Have you ever testified in a court?

A No.

Q Have you ever been convicted of a crime?

A No.

Q What is your educational background, sir?

A I finished high school in Jerusalem, and attended Prince George's Community College, business administration.

Q Did you graduate?

A No.

Q Where did you go to high school in Jerusalem?
A Right.
Q Which school?
A Olive Bramea College.
Q What is your position with your employer?
A I'm the Deputy Chief of Mission for the office.
Q And who is your employer?
A Hasan Abdel Rahman.
Q And he's your supervisor?
A Yes.
Q What is the entity that you work for?
A It's the PLO mission.
Q And you're the Deputy Chief?
A Right.
Q Do you have a business card with you?
A Yes.
Q Could I have one, please?
A Sure.
Q And when did you begin working in this capacity?
A In 1994.
Q And where were you working prior to that?
A I was in the Palestine Affairs Center.
Q Where was that?
A In Washington, D.C.
Q What was your position at the Palestine Affairs
Center?
A Assistant Director.
Q How long had you been there?
A From 1988 or 1989 until 1994.
Q Okay. And prior to that, where did you work?
A Palestine Information Office.
Q And where was that?
A That's from 1979 to 1988. It was closed in 1988
for a few months.
Q Now, in your current employment, you've been
there for 10 years?
A Right.
Q And have you always had the same position?
A Right.
Q And it's always been of the Deputy, did you say
Deputy Director?
A Deputy Chief of Mission.
Q During that time, Mr. Rahman was always the
Director?
A Right.
Q Okay. Could you describe your job duties, sir?
A Well, that's really, I'm the administrative, I'm
in charge of administration and financial affairs within
the office, as well as, you know, I'm in charge when Mr.
Abdel Rahman is away. And you want me to tell you exactly
what office functions?
Q Tell me what you do there, sir.
A Well, I answer questions over the phone whenever
anybody asks questions about the political situation. I
follow day to day work in the office, if there is any mail
that we have to respond to. And I make sure that it goes
in order in the office.

Q Now, you said that you're in charge of the administration of the office?

A Right.

Q So is it fair to say that you run the day to day operations of the office?

A Well, I make sure that everybody comes on time, employees, and everybody's doing his job. And if there is any questions that they have to be answered, I would answer, and that sort of thing.

Q How many employees are there?

A Eight.

Q Can you tell me who they are, what their names are?

A Hasan Rahman, myself, we have Jabron Taweel just recently been appointed ambassador to Malta, he is no longer in the office.

Q Could you spell his name for the record?

A J-A-B-R-O-N T-A-W-E-E-L.

Q And he was there?

A He was. He is no longer.

Q You said he was appointed to a position in Malta?

A Right.

Q When was that?

A As of May 3rd.

Q That was the date of his appointment?

A Right.

Q When did he leave the office?

A Well, actually he wasn't here during the appointment. He left this office in December.

Q And what was his position again, sir?

A He was supposed to follow up the commercial, like a commercial attache, which never happened, actually.

Q I'm sorry?

A Which never took place, because of the circumstances of the situation in the West Bank, on Gaza, you know.

Q So we'll come back to that. But we're going through the employees. Will you tell me what other employees there were?

A There is Hakam Takash.

Q What does Hakam Takash do?

A He is working on our web site. And he is doing the daily power of attorneys that we do in the office for serving the Palestinian community.

Q Okay. Who else?

A There is Ermena Kesheshian.

Q What does she do?

A She is the personal assistant of Mr. Rahman, like a secretary.

Q Okay.

A There is Laila Tarazi. She was just recently appointed, like a few months ago.

Q To what position?

A She is supposed to follow up the NGOs, non-governmental organizations.

Q Explain, what is she doing?

A Coordinating between the office and Arab-American

organizations and American American organizations, like activity type of, whenever there is a conference, a seminar, she informs the office.

Q Does she speak?

A Yes.

Q She would speak at like a conference?

A No. No, no. Just coordination.

Q Okay. Who else, sir?

A That is the local employees, do you really want them too?

Q Please.

A Peter Orionum. We use him as a receptionist, and you know, the messenger.

Q Okay.

A And there is a driver. His name is Achmad, I really don't know his last name. He was recently appointed and he is a Pakistani, and I can't remember his last name.

Q And he's a driver?

A Yes, for Mr. Rahman.

Q Is he a full time employee?

A Yes.

Q So those are the eight employees?

A Right.

Q Okay, but Mr. Taweel is no longer there?

A Right.

Q And has anyone been assigned to take his place?

A Not yet.

Q Now, with regard to Mr. Taweel, you said that he had a, you described his job as being a commercial attache.

A Right.

Q Can you tell us what that entailed?

A To be honest with you, I don't know, because he was appointed like two years ago. And during the two years, there is nothing commercial that we have done between the United States and the West Bank and Gaza. So practically, he did not do any commercial work at all.

Q Was he paid for that two year period?

A Well, he was appointed from there. I didn't appoint him, or Mr. Rahman didn't appoint him. So he was, he got an appointment from over there and he came in. So we cannot but to pay him.

Q Okay. So when you say, who would have appointed him? When you say over there, I want to be just careful for the record. I know what you mean, but --

A The Authority. The Palestinian Authority.

Q So he was appointed by the Palestinian Authority for commercial work in the United States.

A Right.

Q And was he there every day at the office?

A He was until December. And then December, he left and he got the appointment in Malta.

Q Prior to his appointment, I think you said two years ago, who had his job?

A We didn't have any.

Q So is it fair to say, then, he was the first commercial attache?

A Right.

Q Now, you said that there is a Hakam Takash?

A Yes.

Q Is that a man or a woman?

A It's a man.

Q And he is involved in a web site?

A He is supposed to work on our web site. You know, we receive documents from all over the United States, Palestinian community. So he prepares them and stamps them, gives them the proper stamp and Mr. Rahman would sign them. It's like, you know, if somebody wants to do a passport and he cannot go there, before a reason or so, so he gives, he has to have the power of attorney stamped by our office in order for his relative to issue him a passport from passport office from Ramallah or any city in the West Bank.

Q And Mr. Takash then maintains the web site for the office? Is that for the office?

A Yes.

Q The office has its own web site?

A We don't have it. He's working on it.

Q He's working on it.

A And it's not really --

Q So it's not up now?

A No, no.

Q And did you say there's a, it's Laila Tarazi?

A Tarazi.

Q And she was recently appointed?

A Right.

Q When was that approximately?

A I would say November or December, something like that.

Q And what is her title? Does she have a position or title?

A She does not have a position. She's -- her position with the State Department, I will tell you, it's a translator.

Q When you say the State Department, what do you mean by that?

A Well, we are registered with the Department of State as a foreign mission.

Q Yes. Right.

A So we, our names actually is at the State Department as foreign mission.

Q So her job description at the State Department, pursuant to that registration, is as a translator?

A Translator, we thought that there is nothing actually to, because that's how she came in. But we sat down and we thought we'd give her another job, and she's --

Q She has other duties as well?

A Yes, I mean, she, like coordinates things with me in the office and the organization, just to let us know when is this conference taking place, when is that conference taking place.

Q Is she related to the lawyer named Tarazi?

A The one who comes in?

Q Yes.

A I think there is some relation, yes.

Q They're not husband and wife?

A No, no, no. Actually they just met for the first time the other day, although they're from same county.

Q When you say that she coordinates with other, I think you said Arab-American and American-American organizations, could you tell me what that involves?

A It involves bringing information to the director about the activities about the Arab-American organization, as well as the American organization. So he would be, if he is interested to participate, he would go. If he is invited to go to speak, she would remind him that you have a speaking engagement at these conferences.

Q Does she herself speak at any conferences?

A She never does.

Q And is all of her work done in the office or outside the office?

A In the office.

Q But she's the person who interacts or interfaces with organizations?

A Well, there's always the e-mail and the phone. I mean, there is no need for her to go and meet in person with people. They always have conference calls. I don't know she does it, but I see her always in the office. So you could ask her these questions.

Q But if, let's say, an organization requested some information from you or from Mr. Rahman or to appear or for some comment, they would go through her, she's the person who --

A Well, people usually call Mr. Rahman directly, too. I mean, not necessarily she has to be the channel to Mr. Rahman, no.

Q And does the office create any publications?

A No.

Q Any newsletter?

A No.

Q Do they have a mailing list?

A No.

Q Do you send out press releases?

A No.

Q In your job as the director of the administration of the office, do you supervise these employees?

A Yes.

Q And there are no other employees other than the seven that you described and Mr. Taweel who left?

A No.

Q Who else works there?

A There is one who is a cook, actually, who works in Mr. Rahman's house, but he doesn't come to the office.

Q But he works through the office?

A We've never seen him. He was hired to work at Mr. Rahman's house.

Q Who hired him?

A Mr. Rahman.

Q Is he paid through the office?

A Yes.

Q What is his name?

A Omar -- I don't know if I could remember his last

name. But something, F-A-K-H-O-U-D, something like that.

Q How long has he served as a cook for Mr. Rahman?

A I would say three years or four.

Q Did you say that you never met him?

A I've met him, of course, at home. But I've never met him at the office. He's never been to the office.

Q He doesn't work out of the office?

A He doesn't work out of the office.

Q But he's paid through the office?

A Right.

Q And is he full time in Mr. Rahman's home?

A Yes, as far as I know, yes.

Q And Mr. Achmad, whose last name you don't know, the Pakistani, he's a full time driver for Mr. Rahman?

A Right.

Q He's also paid through the office?

A Right.

Q And what does he do when Mr. Rahman is in the office?

A Well, whenever we need him, actually, we can call on him and he'll drive us.

Q He drives other staff members?

A Other staff or, if we have a meeting at the State Department or Capitol Hill, he comes and takes whoever is supposed to go to that meeting. Otherwise, he doesn't show up.

Q And when Mr. Rahman's away, where would he be? Would he be at the office working?

A Mr. Rahman?

Q Mr. Rahman is abroad, or in California, or somewhere else, where would Mr. Achmad be?

A Either at the office or at home. But he is always available.

Q Does he work out of Mr. Rahman's home?

A No, no. He comes to the office.

Q Now, you said he drives for him. Does the office own a car?

A Yes.

Q Which car is that?

A It's a Cadillac.

Q What year?

A I think 2003 -- 2003.

Q Is that paid for through the office?

A It's leased, actually. We don't own it, to be correct.

Q But the office leases it?

A Yes, definitely.

Q Did you procure that lease?

A Yes, we have the lease. It's in Mr. Rahman's name, I would say.

Q Individual lease, not through the office?

A No, it's individually, but we pay through the office.

Q And who is it leased with? Which company?

A I have no idea.

Q Do you pay the checks?

A Yes, I sign the checks, I don't pay the checks.

We have somebody who comes and does the checks for us, and they just give it to me and Mr. Rahman, we sign them, both.

Q So you don't know who then --

A I can get it to you --

Q Sir, let me just finish, because if we speak at the same time, they won't get it down properly.

A Okay, no problem.

Q So do you know the name of the car dealership that --

A I don't recall.

Q So you don't know who the checks are cut to each month?

A I don't, no.

Q You sign the checks, is that right?

A Yes. I mean, I can't remember now. Of course, I look at the check and I know that it goes to the car payment, of course. But to be honest with you, I can't recall who is it for.

Q Do you know how much it costs?

A I would say \$645, something like that.

Q And again, I think you said it's registered in Mr. Rahman's name?

A Right.

Q But it's like a company car that's paid for through the office account?

A Right.

Q Okay. Did you say that the office has a bookkeeper or a bookkeeping company that actually prepares --

A Yes.

Q Who is that?

A His name is Hasan Hamdan.

Q And where does he work?

A He works at the League of Arab States.

Q He's an employee of the League of Arab States?

A Um-hmm.

Q And he serves as a bookkeeper for your office?

A Only when he pays the checks.

Q Okay. And does he review the bills, or do you review the bills?

A No, we review the bills.

Q Okay, so you would direct him to --

A Mr. Rahman actually would direct him, as well as with me, and these bills have to be paid. So he writes the checks, brings them back to us, he just comes and picks them up, go and write the checks, bring them back to us, we sign it and he mails them.

Q Okay. What is Mr. Hamdan's position at the League of Arab States?

A I would assume he's the accountant. I think.

Q Do you know how long he's been --

A I have no idea.

Q -- handling this function for your office?

A Let's see. About two years.

Q And who was doing that before?

A Somebody else who retired and left.

Q Who was that?

A His name is Aziz Nanue. I think that's how he spells it.

Q And when did he -- who employed him?

A Mr. Rahman.

Q Did he work in the office?

A He used to come part time, because accountant is not really a full time job. Twice a week.

Q Okay. And was he employed by the League of Arab States?

A No.

Q So he was like a part-time accountant that the --

A He --

Q Let me finish, okay, because it's not going to go in the tape right. Is he a part-time accountant who would come in a couple times a week --

A Right.

Q -- just for that purpose?

A Right.

Q He wasn't an employee?

A Not that I know.

Q Okay. And did he work in an accounting firm or bookkeeping firm?

A He was actually the former accountant of the Arab League of States.

Q Okay.

A When he retired, he got this job with us, Mr. Rahman asked him to come and do our accounting for part-time job.

Q So he was a part-time accountant who was hired, like a service provider, not an employee?

A Right.

Q Now, Mr. Hamdan, is he paid by the office, by your office?

A We give him, of course, for his, whatever he does for us, about \$800 per month.

Q Eight hundred a month?

A Um-hmm.

Q Do you pay him or do you pay the League of Arab States?

A No, we pay him.

Q Now, when you described your job duties, you said that you were in charge of financial affairs. Does that mean that you run the finances for the office?

A Well, I follow up the financial problems that we face with the ministry of finance over there whenever, you know, it's not like we receive millions of dollars. It's a monthly transfer. So whenever we don't get our transfer the first five days of the month, we run into difficulty. We have to pay the rent, we have to pay the employees, and we have to pay the office expenses. And that's all about it.

Q How much do you receive a month?

A We receive, we have three different transfers. The transfer will come at the beginning of the year for the whole month rent, whole year rent, because this is the only way we can rent an office. You have to have the money in the account in order for somebody to lease you an office,

which is \$8,000 by 12, which is about \$100,000.

Q So once a year you get that?

A Yes. And every month we receive about \$16,000 for salaries, for all employees. And we receive \$4,000 to \$5,000 office expenses.

Q Okay. Now, the first transfer that you talked about, the rental, the yearly rental, who transfers that?

A The ministry of finance.

Q The Palestinian Authority ministry of finance?

A Right.

Q Okay. Is that a wire transfer?

A Right.

Q Into which bank?

A Wachovia.

Q Now, the next transfer that you get every month, the \$16,000 for salaries, who does that come from?

A The same thing, ministry of finance.

Q And into which account?

A Same bank. Same account.

Q Same account.

A Right.

Q And the \$4,000 to \$5,000 in office expenses?

A Same account.

Q And do they come basically automatically? Do you have to request that amount be made, or send in a requisition?

A As I said, you know, sometimes they don't even send it the first 10 days. So that's why I say I have to follow it up. So whenever we don't receive it, I have to keep writing and ask them for it.

Q Who do you write to?

A To the ministry of finance.

Q Who there?

A Well, we have a minister called Salam Fayyad.

Q Salam?

A S-A-L-A-M F-A-Y-Y-A-D.

Q Okay.

A Of course, you know, it's my letter, I can't address it to him, because he's the minister, so Hasan Rahman would sign that letter.

Q Okay. So you deal directly with him?

A Yes.

Q Who sets the budget for the office?

A They do. I mean, we recommend some figures and they don't usually do what we ask for, and they just send what I just mentioned.

Q Does that request go to Mr. Fayyad?

A Right.

Q And that's a yearly request?

A Definitely.

Q Is it on a calendar year?

A Actually our calendar year is June 30th.

Q So approximately, so each June 30th you'd send a budget, is that in a letter --

A Yes.

Q -- to Mr. Fayyad?

A Right.

Q And you'd say, this is what we need for the year?

A Yes.

Q And that would be Mr. Rahman who does that?

A Um-hmm.

Q I may have asked you this, but who hired you for your job?

A I was hired by the PLO.

Q Who specifically?

A You know, we were all hired by President Arafat and the foreign minister and the financial minister. So this is how it comes. When somebody applies for a job, this is how it happens.

Q Who did you apply to for your job?

A It was the president.

Q And that was in 1994?

A No, no, no, my hiring came way before. Because Palestine Affairs Center actually used to be an office for the PLO. It just was with the Justice Department.

Q So you were hired by the PLO?

A Right.

Q And then in 1994 --

A The office became the PLO Mission.

Q And did you have to apply to anyone to continue on?

A No.

Q So when the Palestine Affairs Center, that closed at some point?

A No.

Q It still operates?

A NO, no, it just closed. The office is closed, but the office got a new name because of the recognition of the State Department to the PLO when they entered the peace process for the Israelis and the Oslo Accord took place. So they recognized the Palestine Affairs Center as a PLO mission. So it continued.

Q Okay.

A But the registration of the Justice Department now and the recognition of the State Department is a PLO mission.

Q I think I asked you this before, but I just want to make sure that I'm clear. Your job is the day to day running of the office, is that right?

A Right.

Q Are you involved in setting policy?

A Not really.

Q Is that Mr. Rahman who does that?

A You don't set policy in the office.

Q Okay.

A Policy is usually set over there.

Q Where is there?

A In Ramallah, in Palestine.

Q Okay, and by whom?

A We have a cabinet, we have a president, we have a prime minister and we have a cabinet. And we have a legislative counsel.

Q So who specifically does this office take its instructions from?

A The minister of foreign affairs.

Q And who there, is there anyone specifically there who communicates with your office?

A Dr. Navin Shahph.

Q Can you spell his name?

A N-A-V-I-N S-H-A-H-P-H.

Q What is his position?

A He is the minister of foreign affairs. You know it's like the State Department following all embassies in the world. This is the minister of foreign affairs, actually follows our business with the offices in the world.

Q So direct sort of policy and running of your office comes directly from Dr. Shahph?

A Yes.

Q And your job then is the day to day operations?

A Right.

Q Okay. And is Mr. Rahman involved in the day to day operations?

A Definitely. When the director is here, yes.

Q Do you speak publicly for the office?

A Sometimes.

Q When is the last time you spoke?

A I spoke at the Montgomery College.

Q When was that?

A I would say it was in April.

Q And where prior to that? Anywhere else?

A Actually it was also a high school near Montgomery College, it was sponsored by Montgomery College, but it was for high school students.

Q And that was in April?

A Right.

Q Anywhere prior to that?

A This year, I haven't.

Q Last year?

A Last year I also did Montgomery College. I don't really travel around the United States to speak. But whenever Mr. Rahman cannot make any speaking engagement around the Washington area, I take his place.

Q So what other places have you spoken at on behalf of your office?

A I spoke in Miami, Boca Raton, actually. It was sponsored by Jewish-American organizations.

Q Do you know which organization?

A Several of them.

Q When was that, sir?

A I would say in 1996.

Q Did you give a lecture?

A I gave a speech and then questions and answers.

Q And other than Montgomery College and Boca Raton, any other places that you've spoken?

A No.

Q Those are the only two. How about in Washington, in the Washington area?

A None.

Q How about interviews with the press, radio or television or newspapers?

A I do very little, very little. Newspapers, Arab newspapers, actually.

Q You do speak with the Arab newspapers?

A Very little, yes.

Q Not with the English ones?

A Some radio stations call from Los Angeles or Chicago, not that I have done it recently, but I would say in the last 10 years.

Q Okay.

A I usually give those to Mr. Rahman, because he is the one who is supposed to speak.

Q Now, where is the office currently located?

A At 1320 18th Street.

Q How long has it been there?

A Since February of last year.

Q Prior to that, where was it?

A We were on 1717 K Street.

Q And prior to that?

A Well, it was closed from April of 2002 until February 2003.

Q And where were you operating at that period of time?

A We were at the League of Arab States.

Q Okay. So during that almost a year, you operated at the League of Arab States?

A Right.

Q Now you have your own independent office?

A Right.

Q And 1717 K Street was an independent office?

A Right.

Q And prior to that, where was your office?

A 1730 K Street.

Q And prior to that?

A We were there like 10 years.

Q Were you subleasing from the League of Arab States?

A Where? During the time we stayed there?

Q Yes.

A No, no. Mr. Rahman actually just asked them if we can get one room or two, I mean, it was for him and his secretary.

Q Where were you working?

A And me, I was working at the conference room. Because they don't have the space.

Q Who's your landlord for 1320 18th Street?

A I can't remember. I can get it for you.

Q Okay. You can get that and give it to your attorney?

A Sure.

Q Who was the landlord at 1717 K Street?

A Bush and -- what?

MR. HANANIA: I forgot, but I have it in here.

THE WITNESS: But he did for us, I think.

BY MR. STRACHMAN:

Q He helped you with the leases?

A No, he helped us with the eviction.

Q Oh. Okay.

A We were evicted due to lack of money.

Q I heard about that. That caused me a lot of aggravation.

At any rate, prior to that, you were at 1730 K Street for 10 years?

A That's the same ownership.

Q Same owner, okay.

A Yes.

Q Now, in your office, do you have any volunteers?

A No.

Q Have you ever had volunteers?

A We had an intern for one month or so, two interns.

Q Other than the interns, are there supporters, or college students or people who come in to help and do different things?

A No.

Q And that's been in the last 10 years, you've never had volunteers?

A Right.

Q Okay. And you've had two interns, you said?

A Yes.

Q Who are they?

A I can get them to Mr. Hanania. I can't come up with their names.

Q Do you know what colleges they went to?

A No, because I didn't hire them. So I wouldn't know.

Q Do you know who hired them?

A Of course. Mr. Rahman hired them, they applied to him. And they came to help him on certain, you know, filing, that stuff.

Q When you say filing, do you mean like office work?

A Office work, and attending some hearings or conferences. You know there is a lot of activity in Congress. So I'm sure they attended a few receptions.

Q During what period of time did they work?

A They were last year. Middle of June until first of August.

Q Were they college students?

A Um-hmm.

Q And those are the only interns that your office has had in 10 years?

A Right.

Q And they worked directly with Mr. Rahman?

A Right.

Q Now, you described before the fact that the office receives instructions from Dr. Shahph, how do those instructions come to the office? Do they come by fax, e-mail?

A They could be over the phone with Mr. Rahman, or over faxes or whatever. There isn't really much instruction, to be honest with you. It's just, you know, if there is a communique that they would like us to give to the State Department, we fax it to the State Department or the White House. Or if there is a letter to a member of

Congress or the Senate, these are vital.

Q How often do those instructions --

A Not really very often. I would say once a month to twice a month or once every two months. It depends on the developments, the political developments.

Q And other than that, does Mr. Rahman then operate sort of independently or on his own?

A Well, you know, he's the head of the office. I'm sure he has instructions from the president or the foreign minister. You know, our work actually in the office must be information rather than policy. Mr. Rahman appeared on so many TV channels and programs, and he spoke at every conference in the Washington area and in the United States. He participated in so many symposiums and seminars. This is the type of work Mr. Rahman would do.

Q And who arranges that for him, those appearances?

A Well, you know, he has since 1982. So I would assume people start knowing him and these things would come directly behind. Because we're in the need.

Q So the person who left the office, his name was Jabron Taweel, T-A-W-E-E-L?

A Right.

Q Now, there's a Khalil Foutah?

A He's no longer there.

Q What did he do there?

A He was going around and giving speeches, actually. He was a lecturer.

Q Do you know when he left the office?

A It's been over three years or so.

Q And he was a --

A He was a media personality.

Q In addition to Mr. Rahman?

A Right.

Q How long had he worked there?

A He was there since the Palestine Affairs Center.

Q So that was in 1994?

A Before that.

Q Okay.

A He left.

Q He left three years ago?

A Maybe a little bit more, I'm not sure. I can get you that.

Q Approximately?

A I can't give you a proper date.

Q Where did he go? Do you know where does he work now?

A He works in the Library of Congress.

Q So he works for the U.S. Government?

A Right.

Q Is there a Mr. Darabya there?

A Yes, he was.

Q He was?

A Right.

Q When did he leave?

A You know, this is -- he has a problem with the director. So the director asked him not to come to the office any more. He got suspended.

MR. HANANIA: Who is this guy?

THE WITNESS: Ghaleb Darabya.

BY MR. STRACHMAN:

Q When was he suspended?

A Actually in, I would say in November. November or December.

Q Of 2003?

A Yes.

Q What was his position?

A He was supposed to follow up work in Congress.

Q I guess he didn't and that's why he was suspended?

A You know, these people when they come here as new staffers, they don't know what high ranking is. So I think they got into confrontations on this thing, that people usually want to do whatever they feel like doing. And without the knowledge of the director. So he warned him once, twice, three times, and you can't do this because we are this, and you can't do that because we are this. But the guy never listened to him, and he suspended him.

Q Okay. Where does he work now?

A I have no idea.

Q Is he on the payroll now?

A We don't pay him at all.

Q So when you say he's suspended, what does that mean as opposed to being fired?

A Suspended from the office. He doesn't come to the office any more.

Q He doesn't work for you any more?

A No.

Q Who hired him initially?

A He came from the ministry of foreign affairs.

Q How long had he been working there?

A I would say two years.

Q Does the PLO mission have any employees anywhere else?

A No.

Q Other than the ones that you just described?

A No.

Q Any offices anywhere else?

A No.

Q Do you know if the Palestinian Authority has any offices anywhere else?

A No.

Q Does it have any employees anywhere else in the United States?

A Not that I know of.

Q How about the PLO?

A No.

Q Now, in your capacity in running the office, are you the person who deals with copy machines and telephones, things like that?

A We have a copy machine 12 years old.

Q Okay. But is it your job to interact with the suppliers and --

A Yes, right.

Q And do you have a copier service, do you have a

company who services it?

A Actually, our service ran out, because we didn't pay.

Q And who was that company that you were working with?

A United Business Machines, I want to say. I mean, the service contract was expired, actually. We never renewed it.

Q Where is United Business Machines? Are they in Washington?

A I don't think -- I think. I don't know. This is way before we closed that office.

Q So you're talking about from 1994 forward you've never had a service contract on the copier?

A No, no, no, before we closed the office in 2001 or 2002, when we were evicted. So way before we ran into financial difficulties, we couldn't pay our bills. So this contract was expired and we couldn't pay it.

Q Had you been the individual who initially signed the contract?

A Yes, or Mr. Rahman.

Q Okay. And do you have a contract for water, do you have water in the office?

A No.

Q No?

A No.

Q Okay. And --

A We buy our own water.

Q Are you the individual who negotiated the lease with your present landlord?

A Me and Mr. Rahman, yes, together.

Q Do you ever have any temporary staff, like through a temporary agency?

A No.

Q Do you ever have anybody working in the office who's lent to you from someone else?

A No.

Q Like the League of Arab States, or some other organization?

A No.

Q Like a non-governmental organization?

A No.

Q Or even another embassy or --

A Never.

Q And do you use a printing contractor to print materials?

A We don't issue any press releases or monthly magazines or newsletters at all.

Q How do people know where Mr. Rahman is speaking or if he has something to say about some events in the world? You don't --

A We never --

Q Let me finish.

A Okay.

Q You don't have a mechanism to contact the press or distribution list?

A We are not the ones to publicize that, because

it's the role of the inviting -- the site that invites Mr. Rahman would publicize that. I mean, we don't initiate the activity. It's like, let's say, someone had invited Mr. Rahman to come and speak. So it's his duty actually to publicize the event. Not us.

Q Do you have a public relations firm that's employed by the office?

A No.

Q What about the Bannerman office?

A That's not ours.

Q Who handles that?

A You could ask him.

Q You don't know?

A I really don't.

Q You have no contact with that office?

A Well, of course I see him, but I don't know how he was hired, why he was hired, what does he do.

Q Your office doesn't pay him?

A No.

Q When you say see him, who are you referring to?

A Bannerman.

Q Mr. Bannerman?

A Right.

Q And you know that he does work for the PLO and the PA?

A Well, I heard about it like you, I mean, the same, everybody's asking the same question, I give the same answer. I don't know who hired him. And it's not, we have no relations with him as an office in terms of paying or asking him to do anything.

Q So other than seeing him --

A Yes, we see him on lunches, we see him on seminars and symposiums and conferences.

Q But none of the work of your office is coordinated with him?

A I would say he would talk to Mr. Rahman once a month or something like that. Just fill him in. This is the kind of contact.

Q But you're not coordinating any public relations --

A No.

Q -- or other activity?

A No.

Q Other than the lease for Mr. Rahman's car, does the office have any equipment leases or any other kinds of leases?

A No, we pay for our own fax. The copy machine is being paid. We pay our stationery cash or by check. And there is nothing else actually.

Q Who do you purchase stationery from?

A Staples.

Q And did you say your copier, your fax?

A Fax machine.

Q You rent that?

A No, we paid for it.

Q You bought one?

A You buy one from this -- what was it? Best Buy.

Q Times are tough. Who pays Mr. Maher?

A I don't.

MR. HANANIA: I haven't been paid in over a year.

THE WITNESS: You're after me to pay him.

BY MR. STRACHMAN:

Q I don't want to get into what you discuss with your lawyers, but with respect to making payments to PLO or PA lawyers, you're saying it doesn't come through your office?

A Not that I know. I mean, it doesn't come from our office.

Q Has it ever come through your office since 1994?

A I would say once. That's it.

Q Which lawyer was that?

A It was Matt.

Q So like one, a single one time payment?

A It was when he got the keys, actually, he presented us and that was it.

Q Would that be the eviction proceedings?

A Yes.

Q But any of the other lawyers that have represented the PLO and the PA are not through your office?

A No.

Q And they're not retained for your office?

A No.

Q And it's coordinated through?

A It's between the lawyers and the Authority, I would say.

Q When you say the Authority, I know what you --

A The Palestinian Authority.

Q But you mean the Authority in Ramallah?

A Right. Sorry.

Q I just want to make sure we get it.

A I realize they record -- it doesn't record my hand.

Q Right. And does the -- you said that an individual in your office is preparing a web site. Do you have a web site service provider?

A No, not yet.

Q Have you hired or paid anyone in connection with that web site?

A No.

Q Other than the employee?

A We can't pay our own employees. So how could we hire somebody?

Q Do you have an AOL account for the office?

A Yes.

Q Are you the person whose job it is to interact with AOL?

A Yes.

Q And what about the telephone companies, Evercom and Verizon and StarTech, are you the person who arranged for those services?

A Right.

Q And are you the person who arranged for Newmark and Bank concerning a relocation a couple years ago?

A What was it?

Q Newmark and Bank, a real estate company.

A I don't remember.

Q And now, you described previously that there was one account at Wachovia in which you received the three payments from the PA for the rent, for the employees, and for the expenses of the office. And is that one single account at Wachovia?

A One account.

Q Do you know the account number?

A No.

Q Are there any other accounts that you access on behalf of the PA or the PLO?

A There's only one account.

Q All the finances go through that one account?

A Right.

Q And is that account, is that different from the First Union account?

A Well, Wachovia is First Union.

Q Okay, was Wachovia purchased by First Union?

A Yes.

Q I'd like to show you a document -- I'd like to have this marked, please. I'll give you a copy.

Could you tell us what this is?

A This is rent.

Q Is it a check for rent?

A This is a check for a security deposit when we rented the office.

Q Okay.

A This is the same thing.

Q And in this account, has this become now a Wachovia account?

A No, this is an old account, which was when we were at 1730 K. Yes, this account was closed.

Q So now you have a new Wachovia account?

A Yes. I can get it to Maher to give it to you.

Q Well, let's just make a list of what --

A You want the bank account.

MR. HANANIA: I have them. I'll provide that.

BY MR. STRACHMAN:

Q Wachovia?

A Yes.

Q Okay. What were the other items?

MR. HANANIA: Everything I have a star next to. Landlords, names of landlords, names of the two attorneys, driver's last name. That's it.

MR. STRACHMAN: You can provide those to us?

MR. HANANIA: Yes.

MR. STRACHMAN: Thank you.

BY MR. STRACHMAN:

Q And is this your signature?

A Yes.

Q And did you make out the check to Cushman and Wakefield?

A Right.

Q That's your handwriting where it says Cushman and Wakefield as well?

A That's the landlord. Yes, that's the landlord.

Yes, this is my handwriting.

Q You signed it and you wrote out all the words on the chart?

A Right.

[Whereupon, Hamad Deposition Exhibit No. 2 was marked for identification.]

BY MR. STRACHMAN:

Q Do you have any other accounts at the Riggs Bank?

A It was closed.

Q When was that closed?

A Not -- I'm not sure, but it was last year. I'm trying actually to figure out the date for you, but it was closed last year.

Q Why was that?

A I have no idea. You could ask them. They closed it for us.

Q They closed it?

A Yes.

Q And what happened to the proceeds of the account?

A We removed it to Wachovia then.

Q Okay. What happened, by the way, with this account, the First Union account? Why was that closed?

A When was it closed? It was closed -- I can't give you dates, because I can't remember. Because I can go to the Riggs Bank and ask them exactly when we opened the account with them. Then this will be the date of the account that was closed at First Union. And the same thing, we can go to Riggs and ask them, when did they close our account. It will be the first day we opened the account with Wachovia.

Q Okay. But this First Union account, this was closed by you or by the bank?

A No, it was closed by us.

Q Okay. And what was the reason for that?

A We decided just to change banks.

Q Other than the Riggs, the one current Wachovia and the First Union accounts, does the office maintain any other accounts?

A No.

Q Were there any accounts that you or Mr. Rahman or anyone else has or had access to over the last 10 years for funds that belonged to either the PA or the PLO?

A No.

Q And was there ever a Bank of America account?

A No. I was --

MR. HANANIA: First Union used to be Bank of America, then First Union bought them out.

THE WITNESS: Yes.

BY MR. STRACHMAN:

Q Now, you have, the employees that you have, how often are they paid?

A Once a month.

Q Okay. Who sets their salary?

A Who sets their salary, it's actually set at the time of the appointment of these employees. It depends what kind of degree you have.

Q And you sign all the checks?

A Mr. Rahman does too.

Q He does?

A Dual signature, yes.

Q For each check?

A Yes. Whenever we are, it goes as follows. If we are in town, we have both to sign the checks. If he is not in town, I would sign it by myself but I would send a note to the bank to tell them that Mr. Rahman is not in, please cash those checks. Same thing, when I'm out of town, he does the same thing. So there is no check supposed to be cashed with one signature. This is the policy.

Q And all of those expenses for employees or salaries are paid through Wachovia?

A Right.

Q And prior to that, it was the Bank of America and then First Union?

A Right.

Q What was the Riggs account used for?

A The Riggs was before Wachovia.

Q Okay. What was it for?

A We never had Wachovia. I mean, Wachovia came upon the close of the Riggs Bank. So we changed banks. That's it.

Q You're saying that you never had two accounts at the same time? You only had one account?

A The office, yes, of course.

Q The office only had one account?

A Right.

Q And are there any other banks, other than Wachovia, Riggs, First Union and Bank of America that the office had in the last 10 years?

A Not that I know.

Q Are there any other accounts that you have access to on behalf of the PA, the PLO or the PLO mission?

A This is the only account.

Q Only this one Wachovia account?

A Only Wachovia.

Q What about Mr. Rahman? Does he have access to any other accounts?

A Not that -- the only account for the office actually is the Wachovia account. There is no other account that the office is in charge of.

Q Right. So what about outside of the office? Are there any other accounts that either you or Mr. Rahman have on behalf of the PA or the PLO or any related entity?

A We don't have any accounts.

Q So the only accounts that you have access to are your personal checking account at home and this account?

A Right.

Q And the same with Mr. Rahman?

A I can't speak for Mr. Rahman. I'm sure that he is only having one account.

Q You're not aware of him having access to any other PLO or PA accounts?

A I don't think so.

Q What about anyone else on behalf of the PA or the

PLO?

A I don't think anybody else has access to any other accounts.

Q How about Bannerman Associates? Do you know if they do?

A I have no idea.

Q Do you know if any of the attorneys who have represented the PLO or the PA have access to any bank accounts?

A I have no idea.

Q Do you or Mr. Rahman ever incur expenses on behalf of the office with the PLO and the PA?

A What do you mean by that?

Q Traveling or other kinds of things.

A Well, you know, there is the expense of Mr. Rahman when he goes out of town, of course, you pay his plane ticket.

Q How is that paid?

A It's by the office. But if he is invited, let's say, by a university, let's say in Wisconsin, usually they do cover it for him. But if they say that we would like you to come and speak, we can cover your accommodations but you have to pay for your airplane ticket, we will do that.

Q How does that get paid?

A By a check.

Q By the office account?

A Yes.

Q Do you know if Mr. Rahman or anyone else associated with the PA or PLO gets paid any way other than through that account, the office account?

A I have no idea.

Q Do you know how Matt Bannerman's office gets paid?

A I have no idea.

Q And when you have expense checks or expenses for the office, do you submit forms to the office?

A With the receipts. No check is made to anybody without the receipt.

Q Other than Mr. Rahman, who else might submit a request for reimbursement?

A If Mr. Rahman would, say, ask me to go and meet with somebody for lunch, and I pay for it, of course I get paid.

Q Anyone other than you and Mr. Rahman?

A Not that I know, no.

Q The checks that come in from, I think you said the foreign ministry, is that what you said? The funds that come from the foreign ministry, that's from a wire?

A The funds, no, it's from the ministry of finance. It's a wire, yes.

Q It's a wire right into these?

A Right.

Q Into the office account?

A Right.

Q And previously did it come into the other accounts as well?

A Same account. It's always been a wire.

Q The one office account?

A Right.

Q And never by check?

A Never.

Q Now, does the office provide health insurance for its employees?

A Yes.

Q Who are the insurance carriers?

A Everybody buys his own insurance.

Q I thought you just said the office provides it.

A Yes, everybody buys his own insurance and the office reimburses the person.

Q So you --

A The reason I'm saying that is because there are people who, say, their husbands or wives are insured with some, wherever they work. So we compensate them very small for their insurance. I myself and Mr. Rahman are insured with Blue Cross/Blue Cross. Because, you know, I pay it personally then the office reimburses me. It's the same thing with Mr. Rahman.

Q Blue Cross, is that in Virginia?

A I --

Q You're in Washington.

A It's the same, I think. It's the same one company all over, I would think.

Q Does the office have any credit cards?

A No.

Q Does Mr. Rahman have any credit cards that he uses for business purposes?

A I'm sure he uses his personal one. But whatever he uses, he has to bring the receipt to be paid for it, so he can be reimbursed.

Q And when you write reimbursement checks to him, are you paid for things that he might have charged?

A Um-hmm.

Q Those only on his own personal credit cards?

A Yes, because the office does not have credit cards.

Q Does any other entity --

A I mean, he could pay cash, he could pay by Visa, he could pay by American Express. At the end of the month, he'll bring all the receipts, we'll total the amount and we'll write a check.

Q Does any other entity, has any other entity provided for you or him or anyone else in the office a credit card to use?

A No.

Q And does the PA and/or the PLO file a tax return in the United States?

A No.

Q Any other filings that you make with any other governmental agency in the United States, other than the FARA reports?

A We send the six month report to the Justice Department.

Q That's it? That's the only report?

A Yes.

Q No other filings with the United States?

A No.

Q And none with the IRS?

A No. The office doesn't pay taxes, you know.

Q And you have a, do you have an e-mail provider for the office?

A No.

Q Do the members of the office have e-mail?

A Everybody has his own personal e-mail.

Q I'm going to show you a document, tell us, is that a copy of the business card of Mr. Darabya?

A Yes.

Q Is that right?

A Right.

Q He's the person who was --

A He was suspended, yes.

MR. STRACHMAN: Okay. Can we mark this as an exhibit? Three, okay.

[Whereupon, Hamad Deposition
Exhibit No. 3 was marked for
identification.]

BY MR. STRACHMAN:

Q And now I'm showing you another card. Is that Mr. Rahman's business card?

A Right.

Q Yes?

A Yes.

MR. STRACHMAN: Okay. Can we mark this, please?

[Whereupon, Hamad Deposition
Exhibit No. 4 was marked for
identification.]

BY MR. STRACHMAN:

Q And are those the kinds of things you would get from Staples?

A This one, you mean?

Q Or send to a printer?

A No.

Q Purchased them from the office?

A Yes, we print them some place. No, you can't purchase this from Staples.

Q But I mean, your office, are you involved in purchasing business cards for the staff members?

A No, everybody does his own.

Q Everyone does their own?

A Yes, I did mine, Mr. Rahman did his and this guy did his. That's one of the violations he did.

Q It's one of the what?

A It's one of the violations he did, because it's one of the things that made Mr. Rahman suspend him.

Q Mr. Darabya did a business card for himself?

A Yes. Not only that, because he put here, counselor for political, which he is not supposed to put for political, because nobody is political except Mr. Rahman.

Q So he over-extended his position?

A Right.

Q But everyone does their own, is that right?

A Yes, but with the blessing of Mr. Rahman, with the approval of Mr. Rahman. The reason that this guy, one of the reasons, he told them his position was counselor for Congressional affairs. So he went ahead and printed a card saying, counselor for political and for Congressional affairs.

Q Now, you said that previously Mr. Taweel was involved in, or his job was commercial attache. What was he supposed to be doing? What was his charge?

A I only know the title. I really don't know. All I know is that he came with the appointment to follow up commercial and trade. Since he was appointed, there was no commercial or trade happening between here and there. So I never asked him what he is supposed to do, because the boss is supposed to tell him or he is supposed to report to the boss. So I really don't -- I can't answer this question because I have no information.

Q You didn't supervise him?

A Well, of course, but taking into consideration the situation, what can he do?

Q I'm not criticizing you. I'm just asking whether you supervised him.

A No, I know. But sometimes you go to him and you really tell him he has to go and meet with the Commerce Department, to meet with Commerce Department, to meet with the guy who is in charge of economics at the State Department so he can establish some kind of contact to be able to know what can we benefit from the free trade. But to do that, you really have to have stability. And we discussed that so many times. But how can he go and meet with the Commerce Department and the State Department in order to talk about free trade.

Q So let's go back. He was appointed by who?

A By the president and the foreign minister.

Q So that would be Mr. Arafat and Dr. Shahph.

A Yes.

Q They appointed him to make economic contacts?

A Yes.

Q And did he meet with any companies, U.S. firms?

A No.

Q Why was that?

A Because there is no use to meet with anybody if you don't have stability. Which company would really go to the West Bank and Gaza to do business?

Q So you're saying he did, during the two years that he worked here, he didn't initiate any contacts with any U.S. companies?

A I don't think so.

Q Who would know exactly what he did?

A Well, I guess you'd have to talk to him and Mr. Rahman.

Q Did you supervise his work?

A There was no work to supervise.

Q And you paid him for two years?

A Yes.

Q Do you have more jobs like that available?

A You've got to apply.

[Laughter.]

BY MR. STRACHMAN:

Q So what did he do all day? You're in an office, you worked with him, you were the supervisor, you ran the office. He must have been going out to different companies and saying, let's do deals, let's create a factory, let's do an investment, right?

A Wishful thinking.

Q You're saying he didn't do anything like that?

A No, he didn't.

Q But your office paid him?

A Definitely.

Q And you cut the checks for two years to him?

A Well, I have no choice. It's not me.

Q But that was the intention, then, when he was sent by Mr. Arafat and Dr. Shahph, that he would come out and initiate contacts with U.S. companies and firms for projects, is that right?

A To be honest with you, I don't know. I don't know how a commercial attache would function, because I have nothing to do with it, or trade.

Q Who handles that now in the office?

A Nobody.

Q Who handles in the office the relationship between the PA and the PLO and U.S. companies that provides services to the PA and PLO?

A We have no contact. Not through our office.

Q Who handles that?

A I have no idea.

Q So if the PA has a contract with a construction company to do, to build an apartment building or to build something, your office has nothing to do with it?

A I haven't seen it.

Q In 10 years, you haven't seen any information like that come through your office?

A Not at all.

Q And if it did, you would know?

A I haven't seen it, to be honest with you.

Q Well, would you know if it came through the office?

A I'm sure I would run into something. But I haven't seen any contracts or negotiations.

Q How are those kinds of things handled? Are they directly from the PA officials to companies in the United States?

A Well, I don't know. I really don't. I'm sure, you know, companies are traveling all over the world to work with business and all. So they don't wait for us to bring them over there. Because we have an open budget and they just can drop in anywhere. But I would assume it would be stupid of any company to go and do business in the West Bank and Gaza.

Q See, I'm not interested in whether they're stupid or not.

A I know.

Q I'm not interested in a business analysis. I want to know who's making those communications. You're

saying your office has nothing to do with it.

A Nothing at all.

Q You're positive about that?

A I am positive. As far as I know, as Said Hamad, I don't know.

Q And you've never -- have you ever discussed that with Mr. Rahman?

A He has never mentioned anything to me of the sort.

Q Okay. But if those kinds of contacts occurred, he would know about it and you would know about it?

A Definitely, I'm sure.

MR. HANANIA: Can I take a couple of minutes? I just want to make sure they send those things out before the deadline.

MR. STRACHMAN: Yes, a few minutes.

[Recess.]

BY MR. STRACHMAN:

Q Now, when PA and PLO officials come over to the United States, does your office show them around, do you interact with them?

A We facilitate the meetings for them with the State Department and the White House and the Congress.

Q If they come for other purposes, is your office involved in that?

A Official business.

Q What PA officials or PLO officials have been here in the last three months?

A We had the minister of the negotiation department just last week.

Q Okay. Who is that?

A Saed Erakat.

Q Anyone else?

A The last few months, actually, this is the only one who was here.

Q Does he come by himself or with staff?

A No, he came by himself.

Q And prior to that?

A I think minister of finance, he came also.

Q And who is that?

A Salam Fayyad.

Q Anyone else?

A Not that I know. The last few months have been difficult.

Q Let's say in the last year, 2003.

A Also last year.

Q These are the only people who have come?

A The only people who have come, these two people.

Q Who is Mohamed Raschid?

A He is a Palestinian who actually -- I don't know how to describe him. He is an advisor for Arafat.

Q Has he been here?

A I haven't seen him here.

Q Do you know what he does?

A I have no idea.

Q And this negotiation affairs department, do they have an office? Does it have an office here?

A No.

Q There's no office in the United States?

A Not that I know.

Q Does it have any employees or personnel in the United States?

A Not that I know.

Q How about Michael Tarazi?

A He doesn't reside here.

Q Where does he reside?

A In Ramallah.

Q Are you sure?

A I'm positive.

Q And the other members of the negotiation affairs department, they all work out of Ramallah?

A Yes.

Q None work in the United States?

A They do come here for meetings and Power Point presentations with U.S. officials, yes. And they leave.

Q Do they have any connection with your office, do they interact with your office?

A Not really. I mean, we know that they are here, but usually they do their own business.

Q And you don't coordinate any business with them?

A No.

Q Do you ever speak to members of the negotiation affairs department?

A I was with the minister who is the head of the negotiation department, Saed Erakat. I received him at the airport, I took him to the meetings at the Department of State.

Q When the members of that go out and speak at different universities or symposia, do you go with them on that?

A Not necessarily.

Q But they come over here for that as well?

A I guess they have their own agenda. They just do whatever the negotiation department asks them to do.

Q Do they have an office somewhere?

A In Ramallah.

Q Where in Ramallah?

A I have no idea. To be honest with you, we don't have street numbers and we don't have street names. I mean, you take a taxi and you tell them, take me to the negotiation department, and they take you there.

Q Everybody knows where it is in Ramallah?

A Definitely. It's two square kilometers.

Q And who's the head of that office?

A Saed Erakat.

Q Who works there with him, do you know?

A A lot of people. I can't memorize their names.

Q How big is the staff?

A It's a big office, I would say, 10, 15 people.

Q And you're saying Tarazi is --

A He's one of the team members, yes.

Q He works there full time?

A Yes.

Q Do you know any other lawyers who work there?

A Any other lawyers. I can't remember names.

Q And the Palestine Action Center, prior to 1994, was that owned by the PLO?

A The Affairs Center, yes.

Q Excuse me, Palestine Affairs Center.

A Right.

Q And what happened to that office in 1994?

A It was registered with the Justice Department and the PLO, the Department of State, recognized it and changed the name to PLO mission.

Q Okay. So it's the exact same office?

A Yes.

Q Same people?

A Yes.

Q It just changed its name, basically?

A Right.

Q You have the same fax numbers, telephone numbers?

A Of course, when you move from one place to another, everything changes.

Q Did you use a fax machine at one point that said PAC?

A Yes.

Q And the PLO mission used that number?

A Now when it was PLO mission, no.

Q But right now, the Palestine Affairs Center doesn't operate independently of your office?

A No.

Q It doesn't exist now, really?

A Not at all.

Q Who prepares the FARA reports?

A Mr. Rahman's secretary.

Q And he's involved -- you're not involved in the FARA reports. So he does that on his own with his secretary?

A Well, you know, she keeps records of all his activities. So she has it already. So when the time comes, she would just have to fill in the forms and type all the activities that he has done, and she goes with the accountant and makes the report together.

Q Together with him?

A Yes.

Q And does the PA and the PLO have any assets in the United States?

A Not that I know.

Q Do you have any real estate?

A No.

Q How about bank accounts?

A No.

Q Other than the Wachovia account?

A No.

Q What about the economic development accounts? Who's in charge of those?

A I don't know anything about it.

Q You're not aware of any assets that the PLO or the PA has in the United States?

A Not at all.

Q Are you sure?

A I'm positive.

Q Other than the lawsuit that you indicated your attorney helped you with with respect to the eviction proceeding, has your office been involved in any other lawsuits?

A Not that I remember.

Q What does that mean, not that you remember?

A I don't recall that we were, we had a lawsuit, other than the eviction.

Q So no other legal involvement in the United States?

A No.

Q And the office in New York, are you involved with that office at all? Do you communicate with them?

A No.

Q Why is that?

A Because they have their own business at U.N.

Q And you don't coordinate any activities?

A Well, there's no activities to coordinate. They have their own business. Their mission is the United States. We have nothing to do with them, they have nothing to do with us, except hello and all.

Q You don't communicate with them?

A Of course, hi, how are you, something like that. And if there is anything U.N. affairs and we are interested, then they just fax it to us.

Q That's it?

A Yes.

Q And do you know the staff members there?

A No.

Q Do you know who works there?

A No, I don't.

Q Do you know any of the staff members?

A I know the ambassador, of course.

Q What is his name?

A Mas Al-Abador.

Q Is there anyone else who works there?

A I know another person called Mueen Shrain.

Q Could you spell that, please?

A M-U-E-E-N S-H-R-A-I-N.

Q And what is that person's, what's his job?

A To be honest with you, I don't know.

Q You don't know of any other people there?

A I don't know them personally, no.

Q Do you know of any other people there?

A I don't know, no. I know there are five, six, seven people who work there, but I actually don't know them at all.

Q You don't know their names?

A No.

Q And you don't know what they do?

A No.

Q Do you know if they have any volunteers or interns there?

A I have no idea.

Q Do you know who owns the building that they're in?

A I have no idea.

Q The expenses of your office, you said, are paid by the finance ministry.

A Right.

Q When the FARA reports say that some of the expenses are paid by the PLO and some are paid by the PA, do you know what that means?

A I don't see the reports, but I doubt that it would say that.

Q Why is that?

A Because there isn't something by the PLO. We say exactly where this funding is coming from. It's coming from the ministry of finance.

Q And you don't receive any funds from the PLO?

A There is no accounts for the PLO.

Q I didn't ask if there were accounts. I asked if you received funds.

A We don't. The only funding we receive actually is from the ministry of finance.

Q And do you receive any other in-kind services or benefits or things from any other entity?

A No, we don't.

Q So the only source of any funds or any capital or assets is just from the ministry of finance, is that right?

A Right.

Q No one donates things to your office?

A We don't accept donations.

Q Why is that?

A Because it's illegal.

Q Why is it illegal?

A I guess it is according to our registration with the Justice Department. And if we do, we have to report to the Justice Department anyway.

Q The information that you said you would give to your attorney, you'd be able to get that to us in the next day or so?

A Yes, definitely. Tomorrow.

MR. STRACHMAN: I believe that's all.

[Whereupon, at 3:30 p.m., the taking of the deposition was concluded.]

[By stipulation of counsel,
reading and signature
waived.]

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